

**DEFENDANTS' PROCEDURAL OBJECTIONS TO THE
DECLARATION OF TERRY KEATING, PH.D.**

EVIDENCE	OBJECTION
¶ 11: "Given my experience in the relevant field and my reading of the '189 Patent, I understand the term 'data block' to mean a quantity, set or amount of information or data representing a portion of the terrain and the term 'terrain' to mean the physical features of an area, object or material."	Improper (Belated) Claim Construction Evidence
¶ 13: "Based on my reading of the '189 Patent, I understand the phrase 'hierarchical structure' to mean data blocks arranged in multiple levels of resolution, with each level of the structure containing blocks of a different resolution level."	Improper (Belated) Claim Construction Evidence
¶ 15: "In the '189 Patent, 'coordinates in the terrain' are any of a group of one or more numbers used to determine a position in the terrain. Examples of a 'coordinate' given in the '189 Patent include x, y (longitude, latitude) and height, and/or resolution level. See, e.g., Hameline Decl., Exh. 7, col. 13, Ins 11-17."	Improper (Belated) Claim Construction Evidence
¶ 16: "The '189 Patent suggests that the user can enter more than a 'pair' (or two) coordinates,"	Improper (Belated) Claim Construction Evidence
¶ 17: "An 'indication of a respective resolution level' means something that indicates, points out, or signifies a respective resolution level."	Improper (Belated) Claim Construction Evidence
¶ 20: "'Local memory' is a memory of a local computer."	Improper (Belated) Claim Construction Evidence
¶ 20: "The local hard drive, main memory, and memory cache, as used by Defendants, are all examples of 'local memory'."	Improper (Belated) Claim Construction Evidence
¶ 25: "The Google Earth products include a 'processor,' which in the context of the '189 Patent means hardware and/or software that processes computer-readable instructions. Hameline Decl., Exh. 7 at Fig. 5 (processor 20), col. 10 Ins. 61-67, col. 11, Ins. 39-44."	Improper (Belated) Claim Construction Evidence